

U.S. DISTRICT COURT  
EASTERN DISTRICT-WI  
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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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UNITED STATES OF AMERICA,  
JON W. SANFILIPPO  
CLERK

Plaintiff,

v.

Case No. 09-089 CR-194

JOHN A. BOUMENOT,

Defendant.

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**INFORMATION**

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**The United States Attorney charges:**

1. Between on or about January 1, 2004, and on or about November 1, 2005, in the State and Eastern District of Wisconsin, and elsewhere,

**JOHN A. BOUMENOT,**

and others, knowingly participated in a scheme to defraud and to obtain money from mortgage lenders by means of materially false and fraudulent pretenses and representations, which scheme is more particularly described in the following paragraphs:

**Scheme to Defraud**

2. Mortgage loan originator James Lytle prepared fraudulent loan applications to secure loan funds for the purchase of residential properties, including properties owned and offered for sale by the defendant.

3. The applications were fraudulent in that they were prepared in the names of straw

buyers and contained materially false information about such things as the true identity of the prospective buyer, his income and assets, and other information material to his capacity to pay a mortgage on the subject properties.

4. Based upon the fraudulent loan applications, lenders funded mortgage loans, at least three of which were obtained to fund the purchase of properties owned by the defendant. Those properties were located at 900 and 904 Inlet Shores, Delavan, Wisconsin, and 7574 County Hwy. O, Whitewater, Wisconsin.

5. Subsequent to the funding, the loans were allowed to go into default and foreclosure causing a loss to the respective lenders.

6. In furtherance of the scheme, the defendant signed mortgage documents transferring his properties to straw buyers, and paid Lytle and others for orchestrating the transactions which resulted in the sale of his properties. These payments were not disclosed in any of the mortgage documents.

#### **Execution of the Scheme**

7. On or about January 27, 2005, in the State and Eastern District of Wisconsin, John Boumenot, for the purpose of executing the scheme described above, did knowingly cause to be transmitted in interstate commerce by means of wire communication, funds in the amount of approximately \$300,000, from the warehouse bank account of New State Mortgage LLC, at GMAC/RFC, Bethesda, Maryland, to the trust account of Chicago Title Insurance Co., at U S Bank, N.A., Milwaukee, Wisconsin, for the purchase of 900 Inlet Shore Drive, Delavan, WI.

All in violation of Title 18, United States Code, Section 1343 and 2.

8/18/09

Date



MICHELLE L. JACOBS  
United States Attorney